

United States District Court  
Southern District of Texas  
FILED

AUG 29 2017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

v.

BRANDON BAZAN-RODRIGUEZ  
also known as "Viper"  
CARLOS RAMZEL MALDONADO  
RACHEL ALENE SOTO  
GERARDO FIGUEROA

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Criminal No.

**M-17 - 1289**

**SEALED INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

On or about April 13, 2017 through on or about May 26, 2017 in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**BRANDON BAZAN-RODRIGUEZ  
also known as "Viper"  
CARLOS RAMZEL MALDONADO  
and  
RACHEL ALENE SOTO**

did fraudulently or knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of such merchandise, article or object, to wit: four Century Arms, Model RAS47, 7.62x39mm caliber rifles; a Bersa, Model Thunder, .380 caliber pistol; and a Smith & Wesson, Model SD9VE, 9mm caliber pistol, prior to exportation, knowing the same to be intended for exportation contrary to Title 22, United States Code, Sections 2778(b)(2) & 2778(c) and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, 127.1, and 127.3, a law and regulation of the United States.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**COUNT TWO**

On or about April 11, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**BRANDON BAZAN-RODRIGUEZ**  
**also known as “Viper”**  
**CARLOS RAMZEL MALDONADO**  
**and**  
**GERARDO FIGUEROA**

in connection with the acquisition of a firearm, namely, a Century Arms, Model RAS47, 7.62x39mm caliber rifle, from Academy Sports & Outdoors, in Pharr, Texas, a federally licensed firearms dealer under Chapter 44 of Title 18 of the United States Code, knowingly made and aided, abetted, counseled, commanded, or induced, or procured the commission of the making of a false and fictitious written statement to Academy Sports & Outdoors, which statement was intended and likely to deceive Academy Sports & Outdoors as to a fact material to the lawfulness of the sale of the firearms under Chapter 44 of Title 18 of the United States Code, in that GERARDO FIGUEROA falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that he was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that GERARDO FIGUEROA was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**COUNT THREE**

On or about April 25, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**BRANDON BAZAN-RODRIGUEZ**  
**also known as “Viper”**  
**and**  
**CARLOS RAMZEL MALDONADO**

in connection with the acquisition of a firearm, namely, a Century Arms, Model RAS47, 7.62x39mm caliber rifle, from Academy Sports & Outdoors, in Pharr, Texas, a federally licensed firearms dealer under Chapter 44 of Title 18 of the United States Code, knowingly made and aided, abetted, counseled, commanded, or induced, or procured the commission of the making of a false and fictitious written statement to Academy Sports & Outdoors, which statement was intended and likely to deceive Academy Sports & Outdoors as to a fact material to the lawfulness of the sale of the firearms under Chapter 44 of Title 18 of the United States Code, in that CARLOS RAMZEL MALDONADO falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that he was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that CARLOS RAMZEL MALDONADO was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

**COUNT FOUR**

On or about May 26, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**BRANDON BAZAN-RODRIGUEZ**  
**also known as "Viper"**  
**and**  
**RACHEL ALENE SOTO**

in connection with the acquisition of a firearm, namely, a Century Arms, Model RAS47, 7.62x39mm caliber rifle, from Academy Sports & Outdoors, in McAllen, Texas, a federally licensed firearms dealer under Chapter 44 of Title 18 of the United States Code, knowingly made and aided, abetted, counseled, commanded, or induced, or procured the commission of the making of a false and fictitious written statement to Academy Sports & Outdoors, which statement was intended and likely to deceive Academy Sports & Outdoors as to a fact material to the lawfulness

of the sale of the firearms under Chapter 44 of Title 18 of the United States Code, in that RACHEL ALENE SOTO falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that she was the actual buyer of the firearm described above, when in truth and fact the defendants knew that those statements and representations were false and that RACHEL ALENE SOTO was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

A TRUE BILL

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FOREPERSON

ABE MARTINEZ  
ACTING UNITED STATES ATTORNEY

  
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ASSISTANT UNITED STATES ATTORNEY